

Joseph J. Saltarelli  
Victor L. Prial  
HUNTON & WILLIAMS LLP  
200 Park Avenue  
New York, New York 10166  
(212) 309-1000

Attorneys for Carnival Corporation

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----	X	
SHERMAN GOTTlieb,	:	
	:	
Plaintiff,	:	
	:	
- against -	:	04-CV-4202 (ILG) (VVP)
	:	
CARNIVAL CORPORATION,	:	
	:	
Defendant.	:	
-----	X	

**DECLARATION OF JOSEPH J. SALTARELLI  
IN OPPOSITION TO PLAINTIFF'S MOTION *IN LIMINE***

Joseph J. Saltarelli declares the following, pursuant to 28 U.S.C. § 1746:

1. I am counsel to Defendant Carnival Corporation ("Carnival"). I am fully familiar with this matter and make this Declaration in opposition to Plaintiff's motion *in limine* seeking to preclude Carnival's witness, Fred Stein, from testifying about matters pertaining to the creation of Carnival's travel agent profile for Plaintiff in March 1999.

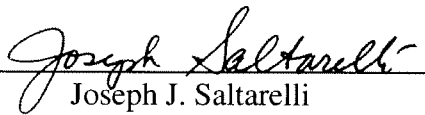
2. Annexed as Exhibit A is a copy of the Declaration of Frederick Stein in Opposition to Plaintiff's Motion for Summary Judgment and in Support of Carnival Corporation's Cross-Motion for Summary Judgment, executed and filed on August 31, 2007 (Docket No. 32).

3. Annexed as Exhibit B are excerpts from the transcript of Mr. Stein's deposition in this action, taken on April 24, 2007, pursuant to Fed. R. Civ. P. 30(b)(6).

4. For the reasons set forth in the accompanying Memorandum of Law, Plaintiff's motion *in limine* should be denied in all respects.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 8, 2010

  
\_\_\_\_\_  
Joseph J. Saltarelli

**DECLARATION OF SERVICE**

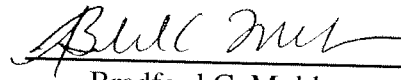
Bradford C. Mulder, hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that:

I am the Managing Clerk for the law firm of Hunton & Williams LLP, attorneys for Defendant Carnival Corporation.

On March 8, 2010, I served a true copy of the attached Declaration of Joseph J. Saltarelli, with exhibits, in Opposition to Plaintiff's Motion *In Limine*, on counsel of record for Plaintiff, at the address listed below, via the Court's ECF System.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 8, 2010

  
Bradford C. Mulder

TO: Andre K. Cizmarik, Esq.  
Anthony J. Viola, Esq.  
Edwards & Angell Palmer & Dodge LLP  
750 Lexington Avenue  
New York, New York 10022  
acizmarik@eapdlaw.com  
aviola@eapdlaw.com

*Attorneys for Plaintiff Sherman Gottlieb*